

UNITED STATES DISTRICT COURT

NORTHERN

DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MOTTIO PASCHAL

FILED

07CR 752

CRIMINAL COMPLAINT

NOV 15 2007

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

CASE NUMBER:

I, R. Brian Wentz, being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about November 14, 2007 in Cook county, in the Northern District of Illinois defendant MOTTIO PASCHAL did

by force, violence, and intimidation, take from the person and the presence of others, on or about November 14, 2007, money belonging to and in the care, custody, control, management, and possession, of the TCF Bank, 10350 South Pulaski Road, Oak Lawn, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

in violation of Title 18 United States Code, Section(s) 2113(a).

I further state that I am a(n) Special Agent with the Federal Bureau of Investigation and that this complaint is
Official Title

based on the following facts:

See attached affidavit

Continued on the attached sheet and made a part hereof: X Yes No



Signature of Complainant

Sworn to before me and subscribed in my presence,

November 15, 2007

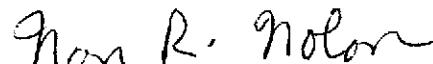
Date

at Chicago, Illinois

City and State

Nan R. Nolan, U.S. Magistrate Judge

Name & Title of Judicial Officer



Signature of Judicial Officer

1
2 COUNTY OF COOK)
3 STATE OF ILLINOIS)
4)

5 **AFFIDAVIT**

6 I. R. Brian Wentz, being duly sworn under oath,
7 state as follows:

8 **Introduction**

9 1. I am a Special Agent of the Federal Bureau of
10 Investigation ("FBI"), Department of Justice, and have been
11 so employed for approximately four years.

12 2. I make this affidavit from personal knowledge
13 based upon my participation in this investigation, reports I
14 have read, and conversations I have had with others who have
15 personal knowledge of the events and circumstances described
16 herein.

17 3. The information below is provided for the
18 limited purpose of establishing probable cause to support a
19 criminal complaint against MOTTIO PASCHAL ("PASCHAL") and
20 does not contain all details or all facts of which I am aware
21 relating to this investigation.

22 **Great Lakes Bank, Alsip, Illinois**

23 4. On November 14, 2007, at approximately 3:30
24 P.M., one African-American male robbed the Great Lakes Bank,
25 11346 South Cicero Avenue, Alsip, Illinois ("Bank #1") which
26 was insured by the Federal Deposit Insurance Corporation
27 ("FDIC") at the time of the robbery. Approximately \$6,539.00
28 in United States Currency ("USC") was taken from Bank #1.

1 5. Bank employees interviewed after the robbery
2 described the suspect as an African-American male,
3 approximately 5'10" tall, with dark skin and a medium build.
4 The suspect was wearing a gray hooded jacket, dark clothing
5 and a white dust mask with a ventilator over his face, and
6 carrying a green bag with white lettering. The suspect
7 entered the bank, walked directly toward the teller line and
8 approached Employee A, a teller. The suspect told Employee A
9 to give him "\$10,000 in cash." Realizing his/her teller
10 drawer did not have that much money, Employee A asked
11 Employee B for \$10,000 in cash. Employee B turned to go back
12 toward the vault area. The suspect asked Employee A "Where's
13 she going?" Employee A did not respond. The suspect then
14 pulled up his shirt, pulled out a green bag with white
15 lettering and told Employee A "put the money in the bag."
16 Employee A complied and emptied the bills into the suspect's
17 bag, with the exception of certain mutilated bills. The
18 suspect peered over the teller counter into the drawer, and
19 said "what is that?", referring to the bundled stack of
20 mutilated bills. Employee A then put the stack of mutilated
21 bills into the bag. The suspect grabbed the bag and walked
22 out of the bank. Bank employees observed the suspect stumble
23 outside the bank, walk toward an Aldi Grocery Store adjacent
24 to the Bank and then stand by a row of parked cars. It
25 appeared that the suspect got into one of the cars. Bank
26 employees then observed several cars leave the Aldi Grocery
27 Store parking lot at the same time.

28 6. A review of Bank #1's surveillance video showed

1 that the suspect was wearing a hooded jacket that appeared to
2 be gray, a dark outer jacket, and a white mask over his face.

3 TCF Bank, Oak Lawn, Illinois

4 7. On November 14, 2007, at approximately 3:45
5 P.M., one African-American male robbed the TCF Bank, 10350
6 South Pulaski, Oak Lawn, Illinois ("Bank #2"), which was
7 insured by the FDIC at the time of the robbery. Approximately
8 \$3,129 in USC was taken from Bank #2.

9 8. Bank employees interviewed after the robbery
10 gave the following physical description of the suspect: an
11 African-American male, approximately 5'10" tall, with dark
12 skin and a medium build, wearing a gray hooded jacket, dark
13 clothing, a white dust mask over his face, and carrying a
14 green bag with white lettering. The suspect entered the
15 bank, walked directly toward the teller line and approached
16 Employee C, a teller. The suspect told Employee C to give
17 him "\$10,000 in cash."

18 9. A review of Bank #2's surveillance video showed
19 that the suspect was wearing a gray colored hooded jacket, a
20 dark outer jacket, and a white mask over his face.

21 10. An officer with the Oak Lawn Police Department
22 responded to a 911 call from Bank #2, and was told by
23 dispatch that bank employees said that the suspect was
24 heading north on Pulaski. The dispatcher also gave a
25 physical description of the suspect's appearance, along with
26 a description of the bag he was carrying. The officer
27 observed MOTTIO PASCHAL, who matched the physical description
28 of the suspect given by Bank #2 employees, a few blocks from

Bank #2. PASCHAL and the officer looked at each other, and PASCHAL took off running.

11. The officer seized PASCHAL after a foot pursuit. At the time of the seizure, PASCHAL was found to have a white mask around his neck. A green bag with white lettering, containing \$3,129 USC, was recovered approximately five feet from where PASCHAL was seized.

12. An employee of Bank #2 who witnessed the robbery positively identified PASCHAL as the robber of Bank #2.

13. One employee from Bank #1 positively identified PASCHAL as the robber of Bank #1. A second employee of Bank #1 was unable to make an identification.

14. On March 29, 2000, PASCHAL was sentenced to 120 months imprisonment, following his conviction for bank robbery under 18 U.S.C. § 2113(a). PASCHAL was released on September 10, 2007.

Conclusion

14. Based on the foregoing facts, Affiant respectfully submits that there is probable cause to believe that on November 14, 2007, MOTTIO PASCHAL, by force, violence, and intimidation, took money belonging to or in the care, custody, control, management, or possession of TCF Bank, the deposits of which both were insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States code, Section 2113(a).

FURTHER AFFIANT SAYETH NOT

+ R. Wentz

R. BRIAN WENTZ
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before
me this 15th day of November, 2007.

Ron R. Holm

U.S. Magistrate